

# EXHIBIT 1



White & Case LLP  
701 Thirteenth Street, NW  
Washington, DC 20005

1 Christopher M. Curran (*pro hac vice*)

2 [ccurran@whitecase.com](mailto:ccurran@whitecase.com)

3 Lucius B. Lau (*pro hac vice*)

4 [alau@whitecase.com](mailto:alau@whitecase.com)

5 Dana E. Foster (*pro hac vice*)

6 [defoster@whitecase.com](mailto:defoster@whitecase.com)

7 White & Case LLP

8 701 Thirteenth Street, N.W.

9 Washington, DC 20005

10 Telephone: (202) 626-3600

11 Facsimile: (202) 639-9355

12 *Counsel to Defendant Toshiba America Information Systems, Inc.*

13 [Additional Defendant and counsel listed on the signature page]

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 (SAN FRANCISCO DIVISION)

17 IN RE: CATHODE RAY TUBE (CRT)  
18 ANTITRUST LITIGATION

Case No. 07-5944 SC  
MDL No. 1917

19 This Document Relates to:

20 P.C. RICHARD ACTION  
21 12-cv-02648-SC

22 **DEFENDANTS TOSHIBA AMERICA**  
23 **INFORMATION SYSTEMS, INC.**  
24 **AND PHILIPS ELECTRONICS**  
25 **NORTH AMERICA**  
26 **CORPORATION'S FIRST SET OF**  
27 **REQUESTS FOR PRODUCTION OF**  
28 **DOCUMENTS TO PLAINTIFFS P.C.**  
**RICHARD & SON LONG ISLAND**  
**CORPORATION, MARTA**  
**COOPERATIVE OF AMERICA,**  
**INC., AND ABC APPLIANCE, INC.**  
**D/B/A ABC WAREHOUSE**

DEFENDANTS TOSHIBA AMERICA INFORMATION  
SYSTEMS, INC. AND PHILIPS ELECTRONICS NORTH  
AMERICA CORPORATION'S FIRST SET OF REQUESTS FOR PRODUCTION  
OF DOCUMENTS TO PLAINTIFFS P.C. RICHARD & SON LONG ISLAND CORPORATION,  
MARTA COOPERATIVE OF AMERICA, INC., AND ABC APPLIANCE, INC. D/B/A ABC WAREHOUSE

Case No. 07-5944 SC  
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Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants Toshiba America Information Systems, Inc. and Philips Electronics North America Corporation hereby request that Plaintiffs P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc. d/b/a ABC Warehouse (collectively, "Plaintiffs") produce for inspection and copying each of the DOCUMENTS and other things described below at the offices of White & Case LLP, 701 Thirteenth Street N.W., Washington, DC 20005, within thirty (30) days after the date of the service hereof.

### DEFINITIONS

1. "YOU" and "YOUR" mean the Plaintiffs responding to these requests, as well as any employees, agents, attorneys, representatives, or other PERSONS acting or purporting to act on behalf of the responding Plaintiff.

2. "COMPLAINT" means the First Amended Complaint filed by the Plaintiffs in the United States District Court for the Northern District of California, Case No. 12-cv-02648-SC, MDL No. 1917, on or about October 3, 2013.

3. "PERSON" means any individual or group of individuals, corporation partnership, association, governmental entity, department, commission, bureau or other kind of legal or business entity.

4. "RELATED TO" means concerning, referring to, alluding to, responding to, connected with, commenting on, in respect of, about, regarding, explaining, supporting, discussing, showing, describing, reflecting, analyzing, constituting, or setting forth, or having any logical or factual connection whatsoever with the subject matter in question.

5. "And" and "or" shall be construed in the conjunctive or disjunctive, whichever makes the requests more inclusive.

6. All nouns in the singular or plural shall be construed in the singular or plural, whichever makes the requests more inclusive.

DEFENDANTS TOSHIBA AMERICA INFORMATION  
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8. “Any” shall be construed to include “all” and vice versa.

1. YOU are required to produce all DOCUMENTS in the manner, form and position in which they are kept in the ordinary course of business, as required by the Federal Rules of Civil Procedure, including, where applicable, any index tabs, file dividers, designations or other information as to the location of the DOCUMENTS.

3. In the event that any requested DOCUMENT has been destroyed, lost, discarded or is otherwise no longer in YOUR possession, custody, or CONTROL, YOU shall IDENTIFY the DOCUMENT as completely as possible and specify the date, manner and reason the DOCUMENT was disposed, the PERSON who authorized the disposal, and the PERSON who disposed of the DOCUMENT.

4. In the event any information is withheld on a claim of attorney-client privilege, work-product doctrine, or any other applicable privilege, YOU shall provide a privilege log that includes at least the following information: the nature of the information contained in the withheld DOCUMENT, the DOCUMENT date, source, and subject matter, the author(s) and recipient(s), such as would enable the privilege claim to be adjudicated, and any authority that YOU assert supports any claim of privilege.

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**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 1:**

All DOCUMENTS referenced in YOUR response to Toshiba America Information Systems, Inc. and Philips Electronics North America Corporation's First Set of Interrogatories.

**REQUEST FOR PRODUCTION NO. 2:**

All DOCUMENTS RELATED TO any formal or informal DOCUMENT retention policies or practices that YOU adopted or followed at any time from March 1, 1995 to and including the present.

**REQUEST FOR PRODUCTION NO. 3:**

All settlement agreements between YOU and any other PERSON RELATED TO any of the claims asserted in the COMPLAINT.

Dated: December 23, 2013

**WHITE & CASE LLP**

By: 

Christopher M. Curran (*pro hac vice*)

[ccurran@whitecase.com](mailto:ccurran@whitecase.com)

Lucius B. Lau (*pro hac vice*)

[alau@whitecase.com](mailto:alau@whitecase.com)

Dana E. Foster (*pro hac vice*)

[defoster@whitecase.com](mailto:defoster@whitecase.com)

701 Thirteenth Street, N.W.

Washington, DC 20005

tel.: (202) 626-3600

fax: (202) 639-9355

*Counsel to Defendant Toshiba America  
Information Systems, Inc.*

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White & Case LLP  
701 Thirteenth Street, NW  
Washington, DC 20005

1 By: Charles M. Malaise / ~~for~~  
2 John M. Taladay (*pro hac vice*)  
3 Joseph Ostoyich (*pro hac vice*)  
4 Erik T. Koons (*pro hac vice*)  
5 Charles M. Malaise (*pro hac vice*)  
6 BAKER BOTTS LLP  
7 1299 Pennsylvania Ave., N.W.  
8 Washington, DC 20004-2400  
9 Telephone: (202) 639-7700  
10 Facsimile: (202) 639-7890  
11 Email: [john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)  
12 Email: [joseph.ostoyich@bakerbotts.com](mailto:joseph.ostoyich@bakerbotts.com)  
13 Email: [erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)  
14 Email: [charles.malaise@bakerbotts.com](mailto:charles.malaise@bakerbotts.com)

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*Counsel to Defendant Philips Electronics  
North America Corporation*

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## CERTIFICATE OF SERVICE

On December 23, 2013, I caused a copy of “DEFENDANTS TOSHIBA AMERICA INFORMATION SYSTEMS, INC. AND PHILIPS ELECTRONICS NORTH AMERICA CORPORATION’S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFFS P.C. RICHARD & SON LONG ISLAND CORPORATION, MARTA COOPERATIVE OF AMERICA, INC., AND ABC APPLIANCE, INC. D/B/A ABC WAREHOUSE” to be served via e-mail on rtietjen@bsflp.com, wisaacson@bsflp.com, piovieno@bsflp.com, as well as counsel for the defendants who have entered an appearance in this case.

DEFENDANTS TOSHIBA AMERICA INFORMATION  
SYSTEMS, INC. AND PHILIPS ELECTRONICS NORTH  
AMERICA CORPORATION'S FIRST SET OF REQUESTS FOR PRODUCTION  
OF DOCUMENTS TO PLAINTIFFS P.C. RICHARD & SON LONG ISLAND CORPORATION,  
MARTA COOPERATIVE OF AMERICA, INC., AND ABC APPLIANCE, INC. D/B/A ABC WAREHOUSE  
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